Message

From: Chapman, Apple [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C52A18BCF6164B6D9F04545DB694CAC1-ACHAPMAN]

Sent: 5/3/2018 5:57:26 PM

To: Dykes, Teresa [Dykes.Teresa@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]

Subject: RE: I just pitched a Webinar for "Enforceable Limits" Needed for MM2A

I believe the answer to both of your questions is yes.

Ms. Apple Chapman | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency 1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) | 202-841-6076 (mobile) |

From: Dykes, Teresa

Sent: Thursday, May 03, 2018 11:58 AM

To: Chapman, Apple <Chapman.Apple@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>

Subject: I just pitched a Webinar for "Enforceable Limits" Needed for MM2A

MACT Major to Area (MM2A) aka OIAI Reversal. Based on yesterday's NSR/Title V Call and permits that are starting to circulate where sources are requesting revisions to Title V based on Wehrum's OIAI Reversal Memo- I realized we need to go back and explain why blanket emission limits e.g., Source may not emit more than 10 tpy of any one HAP or 25 tpy of any collection of HAPS- are not enforceable as a practical matter. I asked Cheryl Vetter if OAQPS would support this. The sooner we get this out, the better.

- 1.) Will you guys and Phill support this effort?
- 2.) Do we have any contract funds if I need them (probably less than \$5k) to help with the prep, etc.?

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